

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

BOAT PEOPLE S.O.S., INC.

Plaintiff,

v.

URBAN AFFAIRS COALITION, et al.

Defendants.

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**Case No. 1:16-cv-00455(GBL/JFA)**

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**CONSENT MOTION FOR  
EXTENSION OF TIME TO FILE RESPONSIVE PLEADINGS**

Defendants Duong Ly and Lan Dinh (“Defendants”), through counsel, respectfully request an extension of time until June 28, 2016 to file their responsive pleading or otherwise file a motion under Rule 12 of the Federal Rules of Civil Procedure. Ly’s answer or responsive motion would otherwise be due on June 7, 2016. Dinh’s answer or responsive motion would otherwise be due on June 22, 2016. Plaintiff’s counsel has consented to an extension.

On June 6, 2016, Defendant retained counsel. Defendants’ counsel pled into this matter on June 7, 2016. Defendants’ counsel is not in a position to file an answer or a motion under Rule 12 of the Federal Rules of Civil Procedure by June 7, 2016 while also maintain counsel’s responsibilities under Rule 11 to perform a reasonable inquiry into the facts and circumstances of the case prior to filing any such document.

This is Defendants’ first request for an extension. No scheduling order has been issued, and no trial date has been set. This extension of time will not prejudice any party or unduly delay this case.

Defendants respectfully request this Court enter the attached order extending Defendants' time to file their responsive pleading or otherwise file a motion under Rule 12 of the Federal Rules of Civil Procedure to June 28, 2016.

Respectfully submitted,

Dated: June 7, 2016

Duong Ly and Lan Dinh

/s/

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/s/

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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 7th day of June, 2016, I electronically filed a copy of the foregoing document with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to all interested parties.

By:       /s/      Joshua Erlich

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**PROPOSED ORDER**

WHEREAS this matter came before the Court on Defendants' Consent Motion for Extension of Time to Respond to File Responsive Pleadings; and

CONSIDERING the Federal Rules of Civil Procedure and this Court's Local Rules, it appears that there is good cause for granting the Motion; and

CONSIDERING that the Plaintiff consents to the Motion;

It is hereby ORDERED that Defendants have until June 28, 2016 to file responsive pleadings to Plaintiff's complaint.

**SO ORDERED** this \_\_\_\_ day of \_\_\_\_\_, 2016.

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United States District Judge